

GREENSPOON MARDER LLP
3993 Howard Hughes Parkway, Suite 400
Las Vegas, Nevada 89169
Phone: (702) 978-4249/ Fax: (945) 333-4256

Richard W. Epstein, Esq. (admitted *Pro Hac Vice*)
Jeffrey Backman, Esq. (admitted *Pro Hac Vice*)
Michelle Durieux, Esq. (admitted *Pro Hac Vice*)
GREENSPOON MARDER LLP
200 East Broward Blvd., Ste. 1800
Fort Lauderdale, FL 33301
Tel: 954 491-1120
Facsimile: 954-343-5624
Richard.Epstein@gmlaw.com
Jeffrey.Backman@gmlaw.com
Michelle.Durieux@gmlaw.com

Phillip A. Silvestri, Esq.
Nevada Bar No. 11276
GREENSPOON MARDER LLP
3993 Howard Hughes Parkway, Ste. 400
Las Vegas, NV 89169
Tel: 702-978-4249
Fax: 954-333-4256
Phillip.Silvestri@gmlaw.com

Kimberly Maxson-Rushton
Nevada Bar No. 5065
Gregory Kraemer
COOPER LEVENSON, P.A.
1835 Village Center Circle
Las Vegas, NV 89134
T: (702) 366-1125
F: (702) 366-1857
krushton@cooperlevenson.com
gkraemer@cooperlevenson.com

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

DIAMOND RESORTS U.S. COLLECTION
DEVELOPMENT, LLC, a Delaware Limited
Liability Company,

Plaintiff,

v.

REED HEIN & ASSOCIATES, LLC d/b/a
TIMESHARE EXIT TEAM, a Washington
Limited Liability Company; BRANDON
REED, an individual and citizen of the State of
Washington; TREVOR HEIN, an individual
and citizen of Canada; THOMAS

Case No.: **2:17-cv-03007-APG-VCF**

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND DEADLINE TO
RESPOND TO SGB'S MOTION TO
DISMISS [ECF #204]**

[First Request]

PARENTEAU, an individual and citizen of the State of Washington; HAPPY HOUR MEDIA GROUP, LLC, a Washington Limited Liability Company; MITCHELL R. SUSSMAN, ESQ. d/b/a THE LAW OFFICES OF MITCHELL REED SUSSMAN & ASSOCIATES, an individual and citizen of the State of California; SCHROETER, GOLDMARK & BENDER, P.S., a Washington Professional Services Corporation; and KEN B. PRIVETT, ESQ., a citizen of the State of Oklahoma,

Defendants.

Pursuant to LR IA 6-1 and Fed. R. Civ. P. 6(b)(1)(A) (“FRCP”), Plaintiff Diamond Resorts U.S. Collection Development, LLC (“Plaintiff”), and Defendant Schroeter, Goldmark & Bender, P.S. (“SGB”), hereby stipulate to extend Plaintiff’s deadline to file a response to SGB’s Special Motion to Dismiss Pursuant to NRS 41.660 [ECF #204]¹ (the “Motion”), currently set for May 15, 2020, until May 29, 2020, and as grounds state as follows:

1. On May 1, 2020, SGB filed the subject Motion.
2. Since SGB filed the Motion, both Plaintiff and SGB have been required to respond to voluminous discovery requests (with current deadlines of May 14 and 15, 2020) and respond to various motions filed in this case. *See*, e.g., Plaintiff’s Responses to SGB’s Motion for Protective Order, [ECF #216], and Reed Hein’s Motion to Compel [ECF #214], and SGB’s response to Diamond’s Motion to Exceed the Deposition Limit [ECF #215], all filed on May 8, 2020.
3. Additionally, as part of responding to discovery, and after the Motion was filed, Plaintiff produced approximately 30,000 pages of owner documents on May 1, 2020, and an additional 35,000 pages of documents on May 8, 2020.
4. Further, during the next two weeks, Diamond will be required to respond to the oppositions filed by SGB, and presumably the other Defendants with regard to Diamond’s Motion to Exceed the Deposition Limit.

¹ The Motion was originally filed as ECF #202, but a corrected image was filed as ECF #204.

5. Concurrently, Plaintiff has been diligently working to respond to the Motion.

6. Due to the importance of the Motion, the additional time necessary to review and produce documents (some of which may be relevant to responding to the Motion), and the additional time needed to draft the responses outlined above, Plaintiff is unable to file a response to SGB's Motion prior to the current deadline of May 15, 2020.

7. As a result, Plaintiff and SGB have agreed to extend Plaintiff's response deadline by two (2) weeks, until May 29, 2020.

8. This stipulation is not made for purposes of delay.

Dated this 13th day of May, 2020

GREENSPOON MARDER, LLP

LIPSON NEILSON, P.C.

/s/ Phillip A. Silvestri, Esq.

/s/ Megan H. Hummel, Esq.

PHILLIP A. SILVESTRI, ESQ.
Nevada Bar No. 11276
3993 Howard Hughes Parkway, Suite 400
Las Vegas, NV 89169
Attorneys for Plaintiff
Diamond Resorts Corporation

JOSEPH P. GARIN, ESQ.
Nevada Bar No. 6653
MEGAN H. HUMMEL, ESQ.
Nevada Bar No. 12404
9900 Covington Cross Drive, Suite 120
Las Vegas, NV 89144-7052

Attorneys for Defendant
Schroeter, Goldmark & Bender, P.S

IT IS SO ORDERED

UNITED STATES DISTRICT JUDGE

DATED: 5/13/2020

GREENSPOON MARDER LLP
3993 Howard Hughes Parkway, Suite 400
Las Vegas, Nevada 89169
Phone: (702) 978-4249/ Fax: (945) 333-4256